



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Kenneth A. Gross, Esq.
Skadden Arps Slate Meagher & Flom, LLP
1440 New York Avenue, NW
Washington, DC 20005

DEC 21 2012

RE: MUR 6584
Johnson & Johnson PAC
and Donald Bohn in his
official capacity as treasurer

Dear Mr. Gross:

On December 18, 2012, the Federal Election Commission accepted the signed conciliation agreement submitted on your client's behalf in settlement of a violation of 2 U.S.C. § 434(b), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). Accordingly, the file has been closed in this matter.

Documents related to the case will be placed on the public record within 30 days. See Statement of Policy Regarding Disclosure of Closed Enforcement and Related Files, 68 Fed. Reg. 70,426 (Dec. 18, 2003) and Statement of Policy Regarding Placing First General Counsel's Reports on the Public Record, 74 Fed. Reg. 66132 (Dec. 14, 2009). Information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 2 U.S.C. § 437g(a)(4)(B).

Enclosed you will find a copy of the fully executed conciliation agreement for your files. Please note that the civil penalty is due within 30 days of the conciliation agreement's effective date. If you have any questions, please contact me at (202) 694-1650.

Sincerely,

Delbert K. Rigsby
Delbert K. Rigsby
Attorney

Enclosure
Conciliation Agreement

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BEFORE THE FEDERAL ELECTION COMMISSION

In the matter of

Johnson & Johnson PAC
and Donald Bohn, in his
official capacity as treasurer

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MUR 6584

OFFICE OF

GENERAL COUNSEL

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CONCILIATION AGREEMENT

This matter was initiated pursuant to information ascertained by the Federal Election Commission ("Commission") in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that Johnson & Johnson PAC and Donald Bohn, in his official capacity as treasurer, ("Respondent") violated 2 U.S.C. § 434(b).

NOW, THEREFORE, the Commission and the Respondent, having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondent and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C.

§ 437g(a)(4)(A)(i).

II. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondent enters voluntarily into this agreement with the Commission.

IV. The pertinent facts in this matter are as follows:

1. Johnson & Johnson PAC is a separate segregated fund registered with the Commission.

2. Donald Bohn is the Respondent's treasurer.

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3. The Federal Election Campaign Act of 1971, as amended ("the Act"), requires committee treasurers to file reports of receipts and disbursements in accordance with the provisions of 2 U.S.C. § 434. See 2 U.S.C. § 434(a)(1) and 11 C.F.R. § 104.1(a). These reports must include, *inter alia*, the total amount of receipts and disbursements. See 2 U.S.C. § 434(b); 11 C.F.R. § 104.3. Committees are also required to disclose itemized breakdowns of receipts and disbursements and disclose the name and address of each person who has made any contribution or received any disbursement in an aggregate amount or value in excess of \$200 within the calendar year, together with the date and amount of any such contribution or disbursement. See 2 U.S.C. § 434(b)(2)-(6); 11 C.F.R. §§ 104.3(a)(3)-(4), (b)(2)-(4).

4. The Respondent originally filed its 2011 February Monthly Report on February 22, 2011. The Respondent filed an Amended 2011 February Monthly Report on March 18, 2011 disclosing previously unreported receipts of \$39,466.40 and previously unreported disbursements of \$84,530. The Respondent also filed an Amended 2011 February Monthly Report on October 3, 2011 disclosing previously unreported disbursements of \$2,011.56.

5. The Respondent originally filed its 2011 March Monthly Report on March 18, 2011. The Respondent filed an Amended 2011 March Monthly Report on October 3, 2011, disclosing previously unreported receipts of \$19,496.55 and previously unreported disbursements of \$9,523.95.

6. Respondent contends that technical difficulties involving a change in outside reporting service providers and the onset of a serious illness to the individual preparing and filing the reports contributed to its reporting errors on its 2011 February and March Monthly Reports. The Respondent discovered these errors without notification from the Commission. Respondent

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contends that it promptly took steps to amend the reports as the correct data was available, and implemented additional procedures to prevent a reoccurrence.

V. Respondent violated 2 U.S.C. § 434(b) by failing to disclose \$58,962.95 in receipts and \$96,065.51 in disbursements on its original 2011 February Monthly and 2011 March Monthly Reports.

VI. 1. Respondent will pay a civil penalty to the Commission in the amount of Five Thousand Dollars (\$5,000), pursuant to 2 U.S.C. § 437g(a)(5)(A).

2. Respondent will cease and desist in committing violations of 2 U.S.C. § 434(b).

VII. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

VIII. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

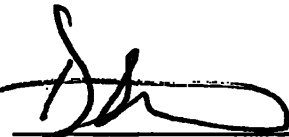
IX. Respondent shall have no more than 30 days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

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X. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained within this written agreement shall be enforceable.

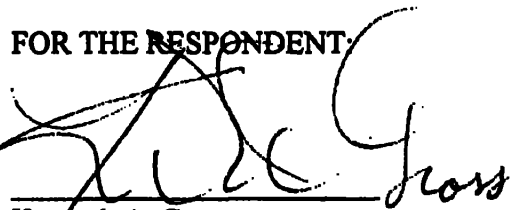
FOR THE COMMISSION:

Lisa J. Stevenson
Special Counsel to the General Counsel

BY: 
Daniel A. Petalas
Associate General Counsel
for Enforcement

12/24/12
Date

FOR THE RESPONDENT:


Kenneth A. Gross
Skadden, Arps, Slate, Meagher & Flom LLP
Attorneys for Respondents
Johnson & Johnson PAC and
Donald Bohn, in his official capacity as Treasurer

8/6/12
Date

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